

# EXHIBIT 213

1                   UNITED STATES DISTRICT COURT  
2                   NORTHERN DISTRICT OF CALIFORNIA  
3                   SAN FRANCISCO DIVISION  
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6   IN RE: JUUL LABS, INC., MARKETING,  
7   SALES PRACTICES, AND PRODUCTS                   Case No.  
8   LIABILITY LITIGATION                           19-MD-02913-WHO

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12                   VIDEO-RECORDED 30(B) (6) DEPOSITION OF  
13                   SAN FRANCISCO UNIFIED SCHOOL DISTRICT  
14                   REGARDING COMMUNICATION AND AWARENESS  
15                   THROUGH ITS DESIGNEE QUARRY PAK  
16                   (Via videoconference)

17                   Thursday, May 27, 2021  
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24   REPORTED BY:  
25   CYNTHIA MANNING, CSR No. 7645, CLR, CCRR  
   JOB NO. 192989

1 product is?

2 A. Yes.

3 Q. When did you first become aware of ENDS  
4 products?

5 A. We became aware of ENDS products around  
6 2015. 2014 is when we first became aware from  
7 the State Department of Education, 2014-15  
8 school year.

9 Q. Do you remember the first time that you  
10 became aware that a student was using an ENDS  
11 product while on campus?

12 A. I don't recall. That would be later in  
13 that time period, like two or three years later.

14 Q. Did there ever come a time when there  
15 was discussions from teachers or school nurses  
16 or any other school personnel about students  
17 using ENDS products?

18 A. Yes, that would be 2017-18. That was  
19 when the requests were coming more to us.

20 Q. Can you describe that for me, when you  
21 first started getting those requests?

22 A. It was a request from principals,  
23 nurses, social workers.

24 Q. And what were they requesting?

25 A. Information about training, education,

1 policies, what they should do with the products,  
2 because they didn't know what to do with it.

3 Q. And did that lead to school board  
4 policies in response to ENDS use?

5 A. We have a tobacco grant, and so we  
6 changed the school board policy in 2014 when we  
7 first learned of the ENDS products.

8 Q. I believe we talked about this during  
9 the first deposition.

10 When you say that they changed the  
11 policy, is that when ENDS products were included  
12 as a tobacco product in the school board policy?

13 A. Correct.

14 Q. And at that point ENDS products were  
15 not allowed on campuses?

16 A. Correct. We are a tobacco-free campus,  
17 city and county, for schools.

18 Q. And as we discussed last time, that  
19 also included nicotine products; correct?

20 A. Yes.

21 Q. With the exception of nicotine products  
22 that were prescribed by a doctor or were being  
23 used for cessation, like nicotine gum?

24 A. No. It's only prescribed by doctors  
25 and medical orders, in my understanding, in my

1           Q. So do you put all of them in one  
2 category or do you think about JUUL separately  
3 from the rest?

4           A. I think both. I think it's like  
5 Kleenex or Band-Aids. You know, it's become  
6 the -- or it was or is the predominantly known  
7 product and most widely used.

8                   So I think our -- when our questions  
9 came and the media requests came, they  
10 specifically asked about JUULs. There was  
11 several generations of ENDS products and JUUL  
12 was like the third wave or something like that.

13           Q. Do you understand JUUL to function  
14 differently than the other products?

15           A. In what way?

16           Q. In any way.

17           A. All the products function differently.  
18 So they --

19           Q. Do you --

20           A. But it's the same -- they are all ENDS,  
21 nicotine delivery systems.

22           Q. They're all ENDS. Okay.

23                   And do you understand JUUL to be better  
24 or worse from a health perspective for the user  
25 than other ENDS products?

1           A. They could be. It depends on which --  
2 what things you're comparing. So that's a very  
3 general question.

4           Q. Okay. Let me try to be more specific.

5                   Is there any particular ENDS product  
6 that you think is less damaging to health than a  
7 JUUL product?

8           A. I can't really think of anything, no.

9           Q. Do you think that there is any ENDS  
10 product that's more damaging to health than a  
11 JUUL product?

12           A. I can't really think of anything, no.

13           Q. Is it fair to say you kind of lumped  
14 them all together in terms of being ENDS  
15 products?

16                   MR. CUTLER: Objection; asked and  
17 answered.

18 BY MR. LEMIEUX:

19           Q. You can answer.

20           A. I don't think I lumped them all  
21 together. I think that we recognize that JUULs  
22 have a lot of nicotine in them and they are  
23 attractive to use. They are marketed as the  
24 iPhone of vapes or e-cigs. So they are very  
25 distinct. And the ads were predominantly in our

1 city. I don't recall any other kind of ads on  
2 corner stores or gas stations, things like that.

3 Definitely when the staff came to us,  
4 they had different kinds of ENDS products, but  
5 they did have a lot of JUUL products because  
6 they were so small.

7 Q. I want to ask you specifically about a  
8 statement you made about nicotine.

9 What is your understanding of how much  
10 nicotine a JUUL product contains versus other  
11 ENDS products?

12 A. Well, we draw from the Stanford Tobacco  
13 Toolkit, and each JUULpod has at least one pack  
14 of cigarettes, if not more, equivalent of  
15 nicotine. So I think we had to update that when  
16 we found out new information.

17 Q. Are you aware that other ENDS products  
18 contain more nicotine than JUUL?

19 A. I suppose that was a similar -- it's  
20 very similar. Some contain less, some contain  
21 more. I don't know exact details of each  
22 product.

23 Q. Okay. You mentioned advertisements.  
24 When's the first time that you recall you saw a  
25 JUUL advertisement?